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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 SANTOS TORRES-NOVERON,
15 Defendant.
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Case No. 2:22-mj-00468-BNW

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Jared Grimmer, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Aden Kebede,
20 Assistant Federal Public Defender, counsel for Santos Torres-Noveron, that the Preliminary
21 Hearing currently scheduled on September 19, 2022, be vacated and continued to a date and
22 time convenient to the Court, but no sooner than one-hundred and twenty (120) days.

23 This Stipulation is entered into for the following reasons:

24 1. The parties are discussing a pre-indictment resolution that may resolve the
25 matter without a preliminary hearing. Defense counsel and defendant need additional time to
26 review the discovery and discuss the proposed resolution.

2. This continuance is not sought for purposes of delay, but to allow defense counsel an opportunity to review the discovery and proposed resolution with their client.

3. Defendant is incarcerated and does not object to a continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the second request for continuance filed herein.

DATED this 13th day of September, 2022.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ Aden Kebede
By _____
ADEN KEBEDE
Assistant Federal Public Defender

/s/ Jared Grimmer
By _____
JARED GRIMMER
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4 Plaintiff,
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6 SANTOS TORRES-NOVERON,
7 Defendant.
8

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ORDER

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
12 September 19, 2022 at the hour of 2:00 p.m., be vacated and continued to
13 January 13, 2023 at 2:00 p.m.

14 DATED this 15th day of September, 2022.

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17 UNITED STATES MAGISTRATE JUDGE
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